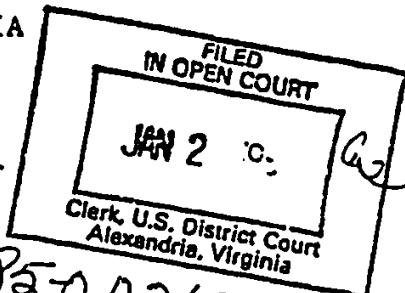


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1986/01/02

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA)
v.) CRIMINAL NO. 85-00263-A
LARRY WU-TAI CHIN,)
a/k/a CHIN WU-TAI,)



SUPERSEDING INDICTMENT

January 1986 Term - At Alexandria.

COUNT I

THE GRAND JURY CHARGES THAT:

A.

Introduction

At all times material to this Indictment,

1. The defendant,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

was serving as a paid agent of a foreign intelligence service, to wit: the People's Republic of China Intelligence Service, variously known as Ministry of Public Security (MPS), and Ministry of State Security.

2. The United States Army Liaison Mission, Hong Kong, and the U.S. Department of State Field Mission, Korea, from 1950 to 1952, was involved in interrogating prisoners of war during the Korean Conflict.

3. The Foreign Broadcast Information Service (FBIS), a division of the Central Intelligence Agency (CIA), Headquartered in Rosslyn, Virginia was primarily involved in monitoring foreign public broadcasting and news media. Additionally, a second primary objective of the FBIS was to provide translation support of classified documents and information for other CIA components.

4. The United States Joint Publications Research Service (JPRS) is also a division of the CIA operating jointly with the FBIS and acting as its translation arm.

5. The defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, was an employee of the United States Army Liaison Mission, American Consulate, Shanghai, China and American Consulate, Hong Kong, from 1948 to 1952. He became an employee of the FBIS in 1952 and served as a Foreign National Monitor Specialist in Okinawa from 1952 to 1961. From 1961 to 1970 he served in Santa Rosa, California as a Foreign National Monitor Specialist. From 1970 until 1981, at which time he retired, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, served as (Staff Employee) Intelligence Officer (Foreign Documents) at FBIS Headquarters, Northern Virginia.

6. The defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, while employed by FBIS, reviewed, translated and

analyzed classified documents from covert and overt human and technical collection sources which went into the West's assessment of Chinese (PRC) strategic, military, economic, scientific and technical capabilities and intentions. In addition, defendant LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, was involved in and aware of the West's intelligence requirements regarding the PRC and the agency tasking to obtain that intelligence.

7. From January 26, 1981 until November 23, 1985, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, served as a contractor for the JPRS.

8. The defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, during his employment with the FBIS Headquarters had access to classified material at all levels including Secret and above.

9. Executive Order 12356 and its predecessors require that information, the unauthorized disclosure of which could reasonably be expected to cause damage to national security, be classified as CONFIDENTIAL, and be carefully safeguarded. When the unauthorized disclosure of information reasonably could be expected to cause serious damage to the national security, it is to be classified as SECRET, and be carefully safeguarded. When the unauthorized disclosure of information reasonably could be expected to cause exceptionally grave damage to the national security, it is to be classified

as TOP SECRET, and be carefully safeguarded.

B.

Objects of the Conspiracy

Beginning in or about 1952, the exact date unknown to the Grand Jury, and continuing until on or about November 22, 1985, at Hong Kong, Toronto, Canada, Macao, Beijing, China, and Rosslyn and Alexandria, Virginia, within the Eastern District of Virginia and elsewhere,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

the defendant herein, did unlawfully, willfully, and knowingly combine, conspire, confederate, and agree with members of the People's Republic of China Intelligence Service (PRCIS), and with divers other persons both known and unknown to commit the following offense against the United States, to wit:

To knowingly and willfully, communicate, deliver and transmit to a foreign government, that is, the People's Republic of China and to representatives, officers, and agents thereof, documents, writings, photographs, photographic negatives, and information relating to the national defense of the United States with the intent and reason to believe that the same would be used to the injury of the United States and to the advantage of the People's Republic of China, in

violation of Title 18, United States Code, Section 794(a).

MEANS AND METHODS OF THE CONSPIRACY

The objects of the conspiracy were to be accomplished as follows:

1. The defendant, LARRY WU-TAI CHIN a/k/a CHIN WU-TAI, would and did obtain and gather from the Foreign Broadcast Information Service (FBIS), a division of the Central Intelligence Agency (CIA), official documents, writings, and other information relating to the national defense of the United States.
2. The defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, would and did meet with co-conspirators and communicate classified information and photographic negatives of classified documents and other classified writings from the aforementioned FBIS (CIA) files relating to the national defense.
3. The defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, after his retirement, maintained his connections with the FBIS and its employees.
4. The defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, would and did use various methods to conceal the conspiracy in order to insure the conspiracy's continuing existence, success and profitability, including but not limited to: filing false tax returns which failed to report income earned from espionage

activities and failed to report CHIN's Hong Kong financial activities; and, failing to report to the Secretary of the Treasury CHIN's interest in Hong Kong bank and financial accounts.

OVERT ACTS

In furtherance of the aforesaid conspiracy and in order to effect the objects thereof, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, and co-conspirators did commit overt acts within the Eastern District of Virginia and elsewhere, including but not limited to the following:

1. In or about 1952, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, agreed to and did provide information to the PRCIS concerning the location of Chinese prisoners of war in Korea and the information that the American and Korean Intelligence Services were seeking from the Chinese POWS during the Korean Conflict in exchange for \$2,000.
2. On or about May 24, 1952, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, at Okinawa, falsely signed a Employment Agreement with the FBIS.
3. In or about 1961, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, was given a correspondent address in Canton, China, as a contact point by a member of the PRCIS.

4. On or about September 21, 1961, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, traveled to Hong Kong.

5. On or about March 15, 1965, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, traveled to Hong Kong.

6. On or about May 9, 1966, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, traveled to Hong Kong.

7. On or about May 20, 1966, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, traveled to Hong Kong.

8. On or about January 28, 1967, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, traveled to Hong Kong.

9. From in or about 1961 to 1967, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, met with members of the PRCIS in Hong Kong and was paid money for his services.

10. In or about April 20, 1970, the defendant, LARRY WU-TAI CHIN, a/k/a, CHIN WU-TAI, falsely signed a Secrecy Agreement with the Central Intelligence Agency.

11. In or about 1976, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, met with a member of the PRCIS and was given contact procedures to be followed by CHIN when making contact with a courier in Toronto, Canada. Additionally, CHIN was given a Hong Kong accommodation address to which CHIN would send a post card addressed

to a Mr. Lou informing him of CHIN's immediate travel plans to Hong Kong.

12. On or about December 28, 1978, at Hong Kong, \$50,000 (H.K.) was deposited into a Hong Kong bank account of the defendant LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI.

13. On or about January 5, 1979, the defendant LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, traveled to Toronto, Canada and met with an agent of the PRCIS and provided him with classified information.

14. On or about June 2, 1979, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, traveled to Toronto, Canada and met with an agent of the PRCIS and provided him with classified information.

15. On or about January 15, 1980, at Hong Kong, \$50,000 (H.K.) was deposited into a Hong Kong bank account of the defendant LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI.

16. In or about July 1980, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, travelled to Toronto, Canada and met with an agent of the PRCIS and provided him with classified information.

17. On or about January 16, 1981, at Hong Kong, \$50,000 (H.K.) was deposited into a Hong Kong bank account of the defendant LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI.

18. On or about March 28, 1981, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, travelled to Toronto, Canada and met with an agent of the PRCIS and provided him with classified information.

19. On or about July 7 to August 9, 1981, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, travelled to Hong Kong and Macao and met with agents of the PRCIS including the Vice Minister, MPS.

20. On or about July 22, 1981, \$40,000 (U.S.) was deposited into a Hong Kong bank account of the defendant LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI.

21. On or about November 7, 1981, the defendant LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI traveled to London, England and met with agents of the PRCIS.

22. On or about February 6, 1982, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, travelled to Beijing, China and met with agents of the PRCIS when he received a promotion to Deputy Bureau Chief (Fu Ju Zhang), MPS, by the State Council.

23. On or about April 3, 1982, at Hong Kong, \$174,000 (H.K.) was deposited into a Hong Kong bank account of the defendant LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI.

24. In or about December, 1982, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, travelled to Toronto, Canada and met with an agent of the PRCIS.

()
25. On or about December 21, 1982, at Hong Kong, \$100,000 (H.K.) was deposited into a Hong Kong bank account of the defendant, LARRY WU-TAI CHIN a/k/a CHIN WU-TAI.

26. On or about June 3, 1983, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, travelled to Hong Kong and met with an agent of the PRCIS.

27. On or about June 14, 1983, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, met with an agent of the PRCIS in Hong Kong.

28. On or about June 18, 1983, at Hong Kong, a Gold Account was opened at a Hong Kong bank in the name of the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI with an initial purchase of 200 taels of Gold costing approximately \$98,000 (U.S.).

29. On or about September 17, 1983, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, travelled to Hong Kong and met with an agent of the PRCIS and indentified an FBIS employee, whom CHIN believed to be susceptible to recruitment by the PRCIS.

30. In or about February/March, 1985, the defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, travelled to Hong Kong, Macao, and the People's Republic of China and met with an agent of the PRCIS.

31. The defendant, LARRY WU-TAI CHIN, a/k/a CHIN WU-TAI, on various occasions from in or about 1976 to in

(
or about 1981, removed classified documents from FBI headquarters, Rosslyn, Virginia, for photographing.

(In violation of Title 18, United States Code, Section 794(c).)

COUNT II

THE GRAND JURY FURTHER CHARGES THAT:

In or about 1952, in Hong Kong, and outside the jurisdiction of any particular State and District,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

the defendant herein, with intent and reason to believe that it was to be used to the injury of the United States and to the advantage of a foreign nation, that is the People's Republic of China, did knowingly and willfully communicate, deliver, and transmit, directly and indirectly, to a foreign government, that is the People's Republic of China, and to representatives, officers and agents thereof, information relating to the national defense, to wit: the location of Chinese (PRC) prisoner of war camps in Korea, and the information the American and Korean forces were seeking from the Chinese (PRC) prisoners of war.

(In violation of Title 18, United States Code, Section 794(a).)

COUNT III

THE GRAND JURY FURTHER CHARGES THAT:

In or about 1952, in Hong Kong, and outside the jurisdiction of any particular State and District,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

then being an officer and employee of the United States and of the American Consulate, Hong Kong, unlawfully, and knowingly did communicate to a person whom

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

knew and had reason to believe was an agent and representative of a foreign government, to wit: People's Republic of China, information of a kind classified by the President and by the head of a department and agency, that is, the United States Army, with the approval of the President, as affecting the security of the United States, that is to say, classified information concerning the location of Chinese (PRC) prisoner of war camps in Korea, and the information the American and Korean forces were seeking from the Chinese (PRC) prisoners of war, the defendant,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

well knowing and having reason to know that such information had been so classified.

(In violation of Title 50, United States Code, Section 783(b).)

COUNT IV

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 5, 1979, in Toronto, Canada,
and outside the jurisdiction of any particular State and
District,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

then being an officer and employee of the United States
and of the Central Intelligence Agency, unlawfully, and
knowingly did communicate to "Mr. Lee", a person whom

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

knew and had reason to believe was an agent and representative
of a foreign government, to wit: People's
Republic of China, information of a kind classified by
the President and by the head of a department and
agency, that is, the Central Intelligence Agency, with
the approval of the President, as affecting the security
of the United States, that is to say, classified information
concerning the West's assessment of Chinese (PRC)
strategic, military, economic, scientific and technical
capabilities and intentions derived from overt and
covert human and technical collection sources, the
defendant,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

well knowing and having reason to know that such information
had been so classified.

(COUNT VI)

THE GRAND JURY FURTHER CHARGES THAT:

In or about July, 1980, in Toronto, Canada, and outside the jurisdiction of any particular State and District,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

then being an officer and employee of the United States and of the Central Intelligence Agency, unlawfully, and knowingly did communicate to "Mr. Lee", a person whom

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

knew and had reason to believe was an agent and representative of a foreign government, to wit: People's Republic of China, information of a kind classified by the President and by the head of a department and agency, that is, the Central Intelligence Agency, with the approval of the President, as affecting the security of the United States, that is to say, classified information concerning the West's assessment of Chinese (PRC) strategic, military, economic, scientific and technical capabilities and intentions derived from overt and covert human and technical collection sources, the defendant,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

well knowing and having reason to know that such information had been so classified.

(In violation of Title 50, United States Code, Section 783(b).)

VENUE

After the commission of the offenses charged in Counts II through VI, all of which were begun or committed out of the jurisdiction of any particular State or district of the United States, the defendant

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

was first arrested in the Alexandria Division of the Eastern District of Virginia.

(Title 18, United States Code, Section 3238.)

COUNT VII

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 1980, in the Eastern District of Virginia,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

a resident of Alexandria, Virginia, did willfully and knowingly make and subscribe, and caused to be made and subscribed, a United States Joint Income Tax Return, Form 1040, for the calendar year 1979, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which said income tax return he did not believe to be true and correct as to every material matter in that:

(1) He failed to report on said tax return that he had received substantial gross income from his employment as an agent of the People's Republic of China Intelligence Service, and

(2) He falsely stated on Schedule B, Part III, that he did not have an interest in or a signature or other authority over a bank account, securities account, or other financial accounts in a foreign country, whereas, in fact, he had signature and other authority over such bank and other financial accounts, and

(3) He failed to report the sale price, the basis, and his net gain or loss from a sale of securities he owned in Hong Kong and Shanghai Banking Corporation.

(Violation of Title 26, United States Code, Section 7206(1).)

COUNT VIII

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 1981, in the Eastern District of Virginia,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

a resident of Alexandria, Virginia, did willfully and knowingly make and subscribe, and caused to be made and subscribed, a United States Joint Income Tax Return, Form 1040, for the calendar year 1980, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which said income tax return he did not believe to be true and correct as to every material matter in that:

(1) He failed to report on said tax return that he had received substantial gross income from his employment as an agent of the People's Republic of China Intelligence Service, and

(2) He falsely stated on Schedule B, Part III, that he did not have an interest in or a signature or other authority over a bank account, securities account, or other financial accounts in a foreign country, whereas, in fact, he had signature and other authority over such bank and other financial accounts.

(Violation of Title 26, United States Code, Section 7206(1).)

COUNT IX

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 1982, in the Eastern District of Virginia,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

a resident of Alexandria, Virginia, did willfully and knowingly make and subscribe, and caused to be made and subscribed, a United States Joint Income Tax Return, Form 1040, for the calendar year 1981, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which said income tax return he did not believe to be true and correct as to every material matter in that:

(1) He failed to report on said tax return that he had received substantial gross income from his employment as an agent of the People's Republic of China Intelligence Service, and

(2) He falsely stated on Schedule B, Part III, that he did not have an interest in or a signature or other authority over a bank account, securities account, or other financial accounts in a foreign country, whereas, in fact, he had signature and other authority over such bank and other financial accounts, and

(3) He reported a total interest income of \$4,391,
whereas, he had substantial additional interest income.

(Violation of Title 26, United States Code, Section
7206(1).)

COUNT X

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 1983, in the Eastern District of Virginia,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

a resident of Alexandria, Virginia, did willfully and knowingly make and subscribe, and caused to be made and subscribed, a United States Joint Income Tax Return, Form 1040, for the calendar year 1982, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which said income tax return he did not believe to be true and correct as to every material matter in that:

(1) He failed to report on said tax return that he had received substantial gross income from his employment as an agent of the People's Republic of China Intelligence Service, and

(2) He falsely stated on Schedule B, Part III, that he did not have an interest in or a signature or other authority over a bank account, securities account, or other financial accounts in a foreign country, whereas, in fact, he had signature and other authority over such bank and other financial accounts, and

(3) He reported a total interest income of \$13,765,
whereas, he had substantial additional interest income.

(Violation of Title 26, United States Code, Section
7206(1).)

COUNT XI

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 1984, in the Eastern District of Virginia,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

a resident of Alexandria, Virginia, did willfully and knowingly make and subscribe, and caused to be made and subscribed, a United States Joint Income Tax Return, Form 1040, for the calendar year 1983, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which said income tax return he did not believe to be true and correct as to every material matter in that:

(1) He failed to report on said tax return that he had received substantial gross income from his employment as an agent of the People's Republic of China Intelligence Service, and

(2) He falsely stated on Schedule B, Part III, that he did not have an interest in or a signature or other authority over a bank account, securities account, or other financial accounts in a foreign country, whereas, in fact, he had signature and other authority over such bank and other financial accounts, and

(3) He reported a total interest income of \$11,774,
whereas, he had substantial additional interest income.

(Violation of Title 26, United States Code, Section
7206(1).)

COUNT XII

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 1985, in the Eastern District of Virginia,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

a resident of Alexandria, Virginia, did willfully and knowingly make and subscribe, and caused to be made and subscribed, a United States Joint Income Tax Return, Form 1040, for the calendar year 1984, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which said income tax return he did not believe to be true and correct as to every material matter in that:

(1) He failed to report on said tax return that he had received substantial gross income from his employment as an agent of the People's Republic of China Intelligence Service, and

(2) He falsely stated on Schedule B, Part III, that he did not have an interest in or a signature or other authority over a bank account, securities account, or other financial accounts in a foreign country, whereas, in fact, he had signature and other authority over such bank and other financial accounts, and

(3) He reported a total interest income of \$13,385,
whereas, he had substantial additional interest
income.

(Violation of Title 26, United States Code, Section
7206(1).)

COUNT XIII

THE GRAND JURY FURTHER CHARGES THAT:

The during the calendar year 1980,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

who was then subject to the jurisdiction of the United States, had a financial interest in and signature and other authority over bank, securities and other financial accounts in a foreign country, namely Hong Kong; that by reason of said relationship to foreign accounts he was required, on or before June 30, 1981, to report such relationship with foreign accounts to the Secretary of the Treasury and to complete and file with the Secretary a Report of Foreign Bank and Financial Accounts (Form 90-22.1); that he willfully failed and caused the failure, in the Eastern District of Virginia and elsewhere, to report such relationship with foreign accounts and to file said report, while violating another law of the United States.

(In violation of Title 31, United States Code, Section 1059(2) (superseded by Title 31, United States Code, Section 5322(b).)

COUNT XIV

THE GRAND JURY FURTHER CHARGES THAT:

The during the calendar year 1981,

LARRY WU-TAI CHIN,
87k7a CHIN WU-TAI,

who was then subject to the jurisdiction of the United States, had a financial interest in and signature and other authority over bank, securities and other financial accounts in a foreign country, namely Hong Kong; that by reason of said relationship to foreign accounts he was required, on or before June 30, 1982, to report such relationship with foreign accounts to the Secretary of the Treasury and to complete and file with the Secretary a Report of Foreign Bank and Financial Accounts (Form 90-22.1); that he willfully failed and caused the failure, in the Eastern District of Virginia and elsewhere, to report such relationship with foreign accounts and to file said report, while violating another law of the United States.

(In violation of Title 31, United States Code, Section 1059(2) (superseded by Title 31, United States Code, Section 5322(b).)

COUNT XV

THE GRAND JURY FURTHER CHARGES THAT:

The during the calendar year 1982,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI;

who was then subject to the jurisdiction of the United States, had a financial interest in and signature and other authority over bank, securities and other financial accounts in a foreign country, namely Hong Kong; that by reason of said relationship to foreign accounts he was required, on or before June 30, 1983, to report such relationship with foreign accounts to the Secretary of the Treasury and to complete and file with the Secretary a Report of Foreign Bank and Financial Accounts (Form 90-22.1); that he willfully failed and caused the failure, in the Eastern District of Virginia and elsewhere, to report such relationship with foreign accounts and to file said report, while violating another law of the United States.

(In violation of Title 31, United States Code, Section 5322(b).)

COUNT XVI

THE GRAND JURY FURTHER CHARGES THAT:

The during the calendar year 1983,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI,

who was then subject to the jurisdiction of the United States, had a financial interest in and signature and other authority over bank, securities and other financial accounts in a foreign country, namely Hong Kong; that by reason of said relationship to foreign accounts he was required, on or before June 30, 1984, to report such relationship with foreign accounts to the Secretary of the Treasury and to complete and file with the Secretary a Report of Foreign Bank and Financial Accounts (Form 90-22.1); that he willfully failed and caused the failure, in the Eastern District of Virginia and elsewhere, to report such relationship with foreign accounts and to file said report, while violating another law of the United States.

(In violation of Title 31, United States Code, Section 5322(b).)

COUNT XVII

THE GRAND JURY FURTHER CHARGES THAT:

The during the calendar year 1984,

LARRY WU-TAI CHIN,
a/k/a CHIN WU-TAI;

who was then subject to the jurisdiction of the United States, had a financial interest in and signature and other authority over bank, securities and other financial accounts in a foreign country, namely Hong Kong; that by reason of said relationship to foreign accounts he was required, on or before June 30, 1985, to report such relationship with foreign accounts to the Secretary of the Treasury and to complete and file with the Secretary a Report of Foreign Bank and Financial Accounts (Form 90-22.1); that he willfully failed and caused the failure, in the Eastern District of Virginia and elsewhere, to report such relationship with foreign accounts and to file said report, while violating another law of the United States.

(In violation of Title 31, United States Code, Section 5322(b).)

A TRUE BILL:

John (S.) Bechtel
FOR PERSON

Elsie L. Munsell
ELSIE L. MUNSELL
UNITED STATES ATTORNEY

Joseph J. Aronica
Assistant United States Attorney

Kent S. Robinson
Assistant United States Attorney

ATTACHMENT

False statements on income tax returns
Title 26, United States Code, Section 7206(1)

Failure to file Foreign Bank Account Reports
Title 31, United States Code, Section 1059(2) superseded
Title 31, United States Code, Section 5322